

**STATEMENT OF BASIS
PERMIT MODIFICATION
WEYERHAEUSER BAY CITY SORTING YARD**

The monthly sampling frequency specified in the permit was based on an incomplete reading of the Discharge Monitoring Report (DMR) Violation/Warning Summary Report for the period of the existing permit. Examination of the DMRs themselves shows that what appeared to be non-submittals on the violation report were simply errors in filling out the report. Further, all but one of the late submissions and permit violations occurred between permit issuance and July 1, 2003. Since July 1, 2003, all DMR submissions have been on time and only one exceedance of permit limits has taken place. The Department of Ecology's policy for reducing sampling frequency calls for using the last two years of permit history to determine reductions in frequency, so that it should follow that increasing permit frequency should use the same period. Sampling frequency is hereby reduced to quarterly.

Nevertheless, seven (7) parameter exceedances and five (5) late submissions for a permit period are less than good performance. When this permit is renewed in 2010, the permit writer should take a close look at Weyerhaeuser's performance.